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19 Attorneys for Defendant  
20 AT&T UMBRELLA BENEFIT PLAN NO. 1

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22 UNITED STATES DISTRICT COURT  
23  
24 FOR THE NORTHERN DISTRICT OF CALIFORNIA

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26 FREDERICK HEGARTY,

27 Case No. C14-01976 EMC

28 Plaintiff,

vs.

AT&T UMBRELLA BENEFIT PLAN NO. 1,

Defendants.

**STIPULATION AND [PROPOSED] ORDER TO CONTINUE THE LAST DAY TO FILE A MOTION FOR ATTORNEY'S FEES AND CASE MANAGEMENT STATEMENT**

Complaint Filed: April 29, 2014

Plaintiff Frederick Hegarty ("Plaintiff") and Defendant AT&T Umbrella Benefit Plan No. 1 (the "Defendant") (collectively referred to as the "Parties") through their respective counsel hereby stipulate as follows:

WHEREAS, on June 11, 2015, the Court issued an order denying Defendant's motion for summary judgment and granting Plaintiff's motion for summary judgment (the "Order") and awarded Plaintiff reasonable attorney's fees [Dkt No. 46];

1 WHEREAS, the Court instructed the Parties to meet counsel over the amount of  
2 attorney's fees and that if no agreement is reached, Plaintiff shall file a motion for attorney's fees  
3 by July 2, 2015;

4 WHEREAS, the Court scheduled a further Case Management Conference for August 27,  
5 2015 [Dkt No. 47]; and

6 WHEREAS, the Parties are continuing to meet and confer over the amount of attorney's  
7 fees and require additional time to complete said meet and confer;

8 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the Parties through  
9 their respective attorneys of record that the last day to file a motion for attorney's fees be July 31,  
10 2015, and the Case Management Conference be continued to September 24, 2015, at 10:30 a.m.

Respectfully submitted,

12 || Dated: June 24, 2015

## LAW OFFICES OF P. RANDALL NOAH

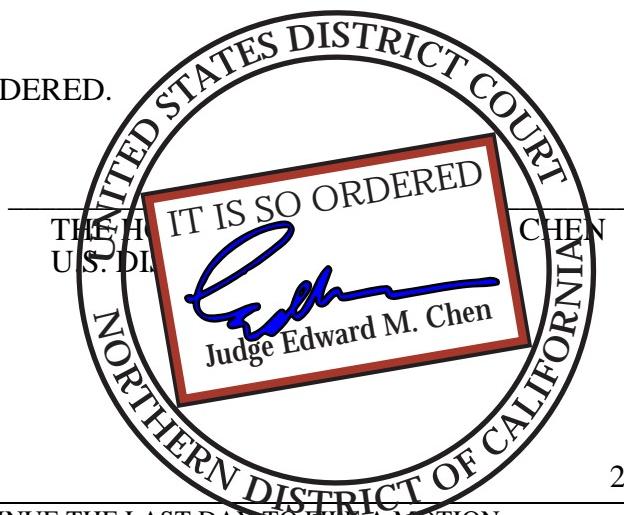
14 /s/ P. Randall Noah  
15 P. RANDALL NOAH  
Attorneys for Plaintiff  
FREDERICK HEGARTY

17 Dated: June 24, 2015 LAFAYETTE & KUMAGAI LLP

18 \_\_\_\_\_  
19 */s/ Susan T. Kumagai*  
20 SUSAN T. KUMAGAI  
Attorneys for Defendant  
AT&T UMBRELLA BENEFIT PLAN NO. 1

PURSUANT TO STIPULATION, IT IS SO ORDERED.

24 Dated: June 26, 2015



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2                   **SIGNATURE ATTESTATION**  
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4                   I hereby attest that I have obtained the concurrence of P. Randall Noah, counsel for  
5 Plaintiff, for the filing of this stipulation.  
6

7  
8  
9                   \_\_\_\_\_  
10                  */s/ Susan T. Kumagai*  
11                  SUSAN T. KUMAGAI  
12

13                   **CERTIFICATE OF SERVICE**  
14

15                  I certify that a copy of this document was served electronically on June 24, 2015, on  
16 counsel of record in compliance with Federal Rule 5 and Local Rule 5.6, by use of the Court's  
17 ECF system.  
18

19                   \_\_\_\_\_  
20                  */s/ Susan T. Kumagai*  
21                  SUSAN T. KUMAGAI  
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